

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

In Re:)	18-31333
)	
VERONICA J. MARKHAM,)	Chapter 13
)	
Debtor.)	Hon. Judge Donald R. Cassling

NOTICE OF MOTION

TO: See attached list

On December 2, 2021, at 9:30 a.m., I will appear before the Honorable Donald R. Cassling, or any judge sitting in that judge's place, and present this motion, a copy of which is attached.

This motion will be presented and heard electronically using Zoom for Government. No personal appearance in court is necessary or permitted. To appear and be heard on the motion, you must do the following:

To appear by video, use this link: <https://www.zoomgov.com/>. Then enter the meeting ID and password.

To appear by telephone, call Zoom for Government at 1-669-254-5252 or 1-646-828-7666. Then enter the meeting ID and password.

Meeting ID and Passcode: The meeting ID for this hearing is **161 414 7941** and the passcode is **619**. The meeting ID and passcode can also be found on Judge Cassling's webpage on the court's website <https://www.ilnb.uscourts.gov/content/judge-donald-r-cassling>.

If you object to this motion and want it called on the presentment date above, you must file a Notice of Objection no later than two (2) business days before that date. If a Notice of Objection is timely filed, the motion will be called on the presentment date. If no Notice of Objection is timely filed, the court may grant the motion in advance without a hearing.

Movants: Veronica J. Markham
By: Michael R. Colter, II
David M. Siegel & Assoc., LLC
790 Chaddick Drive
Wheeling, IL 60090
(847) 520-8100 - davidsiegelbk@gmail.com

CERTIFICATE OF SERVICE

I, Michael R. Colter, II, certify that I served a copy of this notice and the attached motion on each entity shown on the list below at the address shown and by the method indicated on the list on November 11, 2021, before 5:00 p.m.

To the following persons or entities who have been served via electronic mail:

U.S. Bankruptcy Trustee

Thomas H. Hooper, Chapter 13 Trustee

To the following persons or entities who have been served via U.S. Mail:

Veronica J. Markham

4853 S. Forrestville

Chicago, IL 60615

Department of Education

121 S. 13th Street

Lincoln, NE 68508-1904

Acceptance Now

5501 Headquarters Drive

Plano, TX 75024-5837

Heights Finance Corp

P.O. Box 225

Anderson, IN 46017

Atlas Acquisitions LLC

(MidAmerica Bank & Trust)

492C Cedar Lane, Ste 442

Teaneck, NJ 07666

Illinois Student

1755 Lake Cook Rd # K1

Deerfield, IL 60015

Bank of America

P.O. Box 982238

El Paso, TX 79998-2238

Jefferson Capital Systems LLC

P.O. Box 7999

Saint Cloud Mn 56302-9617

Bank of Missouri

5109 S. Broadband Ln.

Sioux Falls, SD 57109

Nationwide Acceptance LLC

Bankruptcy Dept.

10255 W. Higgins Road, Suite 300

Rosemont, IL 60018-5620

CitiBank

701 East 60th Street, N

Sioux Falls, SD 57104-0432

Nissan Motor Acceptance

POB 660366

Dallas, TX 75266-0366

City of Chicago Dept of Finance

c/o Arnold Scott Harris P.C.

111 W. Jackson Ste. 600

Chicago, IL 60604

Portfolio Recovery Assoc., LLC

% Barclays Bank Delaware

P.O. Box 41067

Norfolk VA 23541

Commonwealth Edison

Bankruptcy Department

P.O. Box 6113

Carol Stream, IL 60197-6113

Resurgent Capital Services

P.O. Box 10587

Greenville, SC 29603-0587

Credit One

Bankruptcy Department

P.O. Box 98873

Las Vegas, NV 89193-8873

U.S. Department of Education

c/o Nelnet

121 South 13th Street, Suite 201

Lincoln, NE 68508

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MOTION TO MODIFY PLAN

NOW COMES the Debtor, Veronica J. Markham, by and through her attorney, David M. Siegel & Associates, LLC, to present this Motion, and in support thereof states as follows:

- 1) This Court has jurisdiction pursuant to 28 U.S.C. § 1334 and Internal Operating Procedure 15(a) of the U.S. District Court for the Northern District of Illinois.
- 2) On November 7, 2018, Veronica J. Markham (Debtor) filed for bankruptcy relief under Chapter 13 of Title 11 USC.
- 3) Debtor's plan was confirmed on May 29, 2019, with monthly payments of \$425.00, and general unsecured creditors receiving no less than 10% of their allowed claims.
- 4) Debtor had a medical emergency during July, August, and September resulting in Debtor's current default in plan payments.
- 5) Debtor has returned to work and payroll deductions began posting again October 1, 2021.
- 6) Debtor seeks to modify her plan under § 1329 and defer the current default in plan payments. Deferring the default will not cause the plan to run longer than 60 months.
- 7) General unsecured creditors will still receive no less than 10% of allowed claims.

WHEREFORE, the Debtor, Veronica J. Markham, prays that this Honorable Court enter an Order Modifying Debtor's Chapter 13 Plan and for other such relief as the Court deems fair and proper.

Respectfully Submitted,

/s/ Michael R. Colter, II

Michael R. Colter, II, A.R.D.C. #6304675
Attorney for the Debtor